

LARS T. FULLER (No. 141270)
SAM TAHERIAN (No. 170953)
THE FULLER LAW FIRM, P.C.
60 No. Keeble Ave.
San Jose, CA 95126
Telephone: (408)295-5595
Facsimile: (408) 295-9852

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:
PIERCE CONTRACTORS, INC

Debtor

CASE NO.: 21-50915-SLJ

**NOTICE OF OPPORTUNITY FOR
HEARING ON MOTION TO VALUE
COLLATERAL OF SASSAN RAISSI, ET
AL FOR THE PURPOSE OF MODIFYING
LIEN ON 194 LANTZ DR., MORGAN
HILL, CA**

CHAPTER 11
(Subchapter V)

Date: None Set
Time: None Set
Court: 9

TO Sassan Raissi, a sole individual, as to an undivided 600/1,429,000 interest; Jerry Kiachian, a married man as is sole and separate property, as to an undivided 629,500/1,429,000 interest; Mohsen Keyashian, a married man as his sole and separate property, as to an undivided 200,000/1,429,000 interest ("Lender" hereinafter) , Edward Weber their attorney , Superior Loan Servicing, the U.S. Trustee and all Parties in Interest.

Please take notice that Debtor Pierce Contractors, Inc. will and hereby does move the Court to

1 value the collateral of Lender consisting of real property commonly known as at 194 Lantz Dr.,
2 Morgan Hill, CA [hereinafter "Property"] for the purpose of cramming its lien on the basis that the
3 lien is partially under-secured.

4 This motion is based on this Notice of Opportunity for Hearing on Motion to Value Collateral
5 of Sassan Raissi, et al for the Purpose of Modifying Lien on 194 Lantz Dr., Morgan Hill, CA, the
6 Motion to Value Collateral of Sassan Raissi, et al for the Purpose of Modifying Lien on 194 Lantz
7 Dr., Morgan Hill, CA, the Memorandum of Points and Authorities in Support of Motion to Value
8 Collateral of Sassan Raissi, et al for the Purpose of Modifying Lien on 194 Lantz Dr., Morgan Hill,
9 CA, the Declaration in Support of Motion to Value Collateral, on the papers, records, and other
10 documents on file herein, and on such oral and documentary evidence as may be presented at the
11 hearing of this motion.
12

13 This motion is brought pursuant to B.L.R. 9014-1(b)(3), Bankruptcy Rule 3012, and notice is
14 pursuant to FRBP 7004(b).
15

16 (i) That Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the Northern
17 District of California prescribes the procedures to be followed and that any objection to the requested
18 relief, or a request for hearing on the matter, must be filed and served upon the initiating party within
19 21 days of mailing of the notice;
20

21 (ii) That a request for hearing or objection must be accompanied by any declarations or
22 memoranda of law the party objecting or requesting wishes to present in support of its position;

23 (iii) That if there is not a timely objection to the requested relief or a request for hearing, the
24 Court may enter an order granting the relief by default; and

25 (iv) That the initiating party will give at least 7 days written notice of hearing to the objecting
26 or requesting party, and to any trustee or committee appointed in the case, in the event an objection or
27 request for hearing is timely made; or the tentative hearing date.
28

1 If you oppose the motion, you may file a written opposition and must request a hearing and
2 serve a copy thereof on the following parties and entities:

3
4 THE BANKRUPTCY COURT: UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 280 South First Street, 3rd Floor
San Jose, CA 95113

6
7 DEBTOR'S COUNSEL: LARS T. FULLER, ESQ.
THE FULLER LAW FIRM, P.C.
8 60 N. Keeble Avenue
San Jose, CA 95126

9
10 DEBTOR: PIERCE CONTRACTORS, INC
194 Lantz Dr,
11 Morgan Hill, CA 95037

12 Respectfully Submitted,

13 Dated: July 9, 2021

14 THE FULLER LAW FIRM, P.C.

15
16 By: Lars T. Fuller
LARS T. FULLER
17 Attorney for Debtor